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April 3, 2020

BY ECF AND E-MAIL

Honorable Loretta A. Preska
United States District Judge
United States District Court for the
Southern District of New York
United States Courthouse
500 Pearl Street, Room 2220
New York, New York 10007-1312

Re: *Peterson v. Islamic Republic of Iran*, 10-cv-4518 (LAP); Dechert LLP's Invoice for
November 2019

Dear Judge Preska:

In accordance with the Order Appointing Special Master entered June 7, 2017 (ECF No. 775; referred to herein as the "Appointing Order"), I am writing to seek approval of my invoice for November time. In support of this request, I am filing this letter on the public docket, with a summary of the number of hours my associate and I recorded in November, and the time value recorded for each of us. As the summary indicates, I am requesting approval for payment of \$6,103.80 in fees. My time was billed at the court-approved rate, which reflects a discount of approximately 23%, and the time of the associate who worked on the matter was billed at a rate that reflects a discount of 10%, off of customary hourly rates.

Pursuant to the terms of the Appointing Order, I am providing the details behind the summary only to the Court. I note for the record, however, that during November, my associate and I continued to devote time to the issues that need to be resolved in order to complete a final distribution from and termination of the Qualified Settlement Fund (the "QSF"). That work included primarily analyzing the Trustee's updated plans for finalizing the distribution, and holding telephone conferences and corresponding with counsel and accountants for the Trustee regarding the foregoing and related issues.

If Your Honor finds the billing records to be in order, I respectfully request that the Court order payment of the invoice from funds in the QSF, without charging any portion of the invoice to the 13% plaintiffs, as contemplated by the Appointing Order. (*See Appointing Order*, at 6.)



Honorable Loretta A. Preska
April 3, 2020
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Of course, if Your Honor has any questions about the invoice submitted for November or any other issues concerning this action, I would be happy to address them at the Court's convenience.

Respectfully,

/s/ Kathleen N. Massey

Kathleen N. Massey

Enclosure (summary and detailed bill)

Copy to: All Counsel on ECF Service List (with summary bill)



DATE April 2, 2020

INVOICE NO. 1443541

MATTER NO. 154493

FED. ID. 23-1425587

DECHERT LLP

1095 AVENUE OF THE AMERICAS

NEW YORK, NY 10036-6797

Southern District of New York
United States Courthouse
500 Pearl St.
Room 2220
New York, NY 10007-1312

Re: CONFIDENTIAL - Special Master in Peterson v. Iran

FOR PROFESSIONAL SERVICES RENDERED through November 30, 2019:

TOTAL FEES: **\$6,103.80**

TOTAL AMOUNT DUE: **\$6,103.80**

PLEASE INCLUDE REFERENCE NUMBER AND REMIT TO OUR CITIBANK LOCKBOX ACCOUNT AT:

**DECHERT LLP
P.O. BOX 7247-6643
PHILADELPHIA, PA 19170-6643**

DECHERT LLP

DESCRIPTION OF LEGAL SERVICES

November 30, 2019

TIME AND FEE SUMMARY

<u>TIMEKEEPER</u>		<u>RATE</u>	<u>HOURS</u>	<u>FEES</u>
K. Massey	Partner	927.00	4.40	4,078.80
P. Kingsbery	Associate	810.00	2.50	2,025.00
			<hr/>	<hr/>
	TOTALS		6.90	\$6,103.80